

# EXHIBIT 13

Bozorgi, Mahammad

May 17, 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

In re CASSAVA SCIENCES INC.  
SECURITIES LITIGATION,

\_\_\_\_\_) Master File No.  
) 1:21-cv-00751-DAE  
This Document Relates to: )  
)  
ALL ACTIONS. )  
\_\_\_\_\_)

VIDEOTAPED DEPOSITION OF MOHAMMAD BOZORGI

SAN DIEGO, CALIFORNIA

FRIDAY, MAY 17, 2024

9:14 A.M.

Stenographically reported by:

Kayla Lotstein  
California CSR No. 13916, CRR, RPR, CRC

Henderson Legal Services

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25 of investment experience; is that right? 10:41:59

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1 A That is correct, sir. 10:42:01

2 Q What's your 20 years of investment experience? 10:42:02

3           A       This is related to my construction business.       10:42:08

4 Real estate, basically. That's what I mean by that. 10:42:12

5 Q What investments have you made in real estate? 10:42:16

6 A I have bought some property and sold before. 10:42:20

7 Q What properties have you bought and sold? 10:42:25

8 A In Iran, and one property in Los Angeles I had 10:42:27

9 many years before, in Malibu. 10:42:34

10 Q What properties have you bought and sold in 10:42:38

11 Iran? 10:42:41

12           A     Rental properties, mainly.                                 10:42:42

13 Q What rental properties? 10:42:46

14           **A**     The ones we spoke about.                                 10:42:48

15 Q The two rental properties that you own in 10:42:52

16 Iran? 10:42:54

17           A     Correct, sir.

10:42:55

18 Q You inherited those; right? 10:42:56

19 A Inherited and some of them -- some also I did 10:42:58

20 through the trading that I did myself. Not all of it's 10:43:03

21 inherited. Part of it is inherited. Part of it was my 10:43:07

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22      own working experience.                                10:43:12
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23 Q You own a five-unit residential building in 10:43:16

24 Tehran; right? 10:43:20

A That is correct.

10:43:21

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1 Q Did you purchase that? 10:43:22

2 A Well, as I told you, see, some of it was 10:43:23

3 inheritance money I invested, and then at the end, I buy 10:43:27

4 this five-story building. 10:43:31

5 It was not all inheritance money. Some of 10:43:34

6 them I made investment buying and selling. At the end, 10:43:37

7 I buy the five-story apartment. 10:43:40

8 Q So you purchased the five-story building? 10:43:45

9 A Yes, sir. Yes. See, I have -- I have 10:43:48

10 inherited, you know, some properties, my parents' 10:43:51

11 property. I have turn them into, you know, a better 10:43:56

12 investment. 10:44:00

13 In other words, I sold them. I purchased this 10:44:02

14 property in Tehran, but the one in Shiraz is my 10:44:05

15 inheritance. 10:44:10

16 Q What properties did you inherit from your 10:44:12

17 parents? 10:44:14

18 A The one that's in Shiraz. It was not -- it 10:44:15

19 was a land. I built it myself. 10:44:17

20 Q So you inherited the land -- 10:44:20

21 A Correct. 10:44:23

22 Q -- in Shiraz? 10:44:23

23 And you built the building that houses the 10:44:26

24 five shops? 10:44:28

25 A Correct, sir. 10:44:29

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1 right? 02:36:08

2 A That is correct, sir. 02:36:09

3 Q Okay. So that's more than \$300,000 worth of 02:36:14

4 Cassava stock; is that right? 02:36:17

5 MR. DROSMAN: Objection. Vague and ambiguous. 02:36:22

6 MR. CAMPBELL: You don't like math. You always 02:36:23

7 think it's vague. 02:36:23

8 MR. DROSMAN: Well, if you want to give him a 02:36:23

9 calculator and do the math. I don't think that's fair 02:36:23

10 to ask him whether 76.81 times, you know, 4400 is a 02:36:27

11 certain number. I can't do it in my head. 02:36:32

12 MR. CAMPBELL: I bet you can do 4 times 74. 02:36:36

13 MR. DROSMAN: No. I can't do it. 02:36:39

14 MR. CAMPBELL: I bet he can. 02:36:40

15 THE WITNESS: Let's make a bet. 02:36:42

16 MR. CAMPBELL: All right. 02:36:43

17 MR. DROSMAN: You'd be losing that bet. I can't do 02:36:43

18 it. I'm not kidding. 02:36:43

19 BY MR. CAMPBELL: 02:36:45

20 Q I'll represent to you 4 times 75 is 300. 02:36:45

21 All right. 02:36:49

22 A Okay. 02:36:50

23 Q But the general question is why would you 02:36:51

24 invest more than \$300,000 in Cassava stock in 02:36:52

25 February of 2021? 02:36:56

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1           **A**     **I do not remember, sir. It's been so long.**           02:36:58

2           **Q**     Did you do any research into Cassava's           02:37:05

3 business before investing \$300,000-plus in Cassava in           02:37:08

4 February of 2021?           02:37:13

5           **A**     **Yes, sir. Google search.**           02:37:14

6           **Q**     Did you do anything besides conduct a Google           02:37:16

7 search of Cassava?           02:37:18

8           **A**     **No, sir.**           02:37:20

9           **Q**     Do you know how you came across the name           02:37:21

10 Cassava to search for?           02:37:23

11           **A**     **As I said, Google search. Sometimes, you**           02:37:27

12 **know, when you're watching Google News, it comes up.**           02:37:29

13 **Like Cassava Sciences are looking for, you know, drugs,**           02:37:32

14 **you know. Now I put my -- do the Google search and,**           02:37:36

15 **you know, different news comes up like that.**           02:37:39

16           **Q**     Do you recall what you read on Google that led           02:37:44

17 you to purchase the stock?           02:37:46

18           **A**     **Yes, some of it, not all, but that they are**           02:37:49

19 **looking -- at that time I believe they had started doing**           02:37:54

20 **some testing on Alzheimer, and I believe they had some**           02:38:03

21 **research group in Sweden or Switzerland -- I don't know.**           02:38:10

22 **I don't recall exactly -- and that it started some phase**           02:38:15

23 **studies, and it seemed like to be a prominent company,**           02:38:22

24 **so that's why I decided to go with Cassava Science.**           02:38:27

25           **Q**     You mentioned a research group in Sweden or           02:38:41

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1 Switzerland they had. Who's the research group? 02:38:43

2 A I don't recall, sir. 02:38:47

3 Q What did they conduct research on? 02:38:50

4 A On Alzheimer disease, trying to find a cure. 02:38:52

5 Q So do you think that Cassava was doing 02:38:57

6 research in Switzerland or Sweden on finding a cure for 02:39:00

7 Alzheimer's? 02:39:06

8 A I think they had hired a consultant to do the 02:39:06

9 testing for them. 02:39:08

10 Q Okay. And do you know what the consultant was 02:39:10

11 testing for? 02:39:11

12 A Finding a cure for Alzheimer -- Alzheimer. 02:39:12

13 Q Do you know what Cassava does? 02:39:16

14 A Looking for drug to cure Alzheimer. 02:39:18

15 Q Is there a difference between what Cassava 02:39:23

16 does and what the research group in Switzerland or 02:39:25

17 Sweden does? 02:39:28

18 A I would not know, sir. 02:39:29

19 Q You say, "It seemed to be a prominent 02:39:41

20 company." 02:39:43

21 What do you mean by that? 02:39:43

22 A Well, according to what I saw in Google, it 02:39:45

23 seemed like they might have a -- that they are 02:39:47

24 researching to get a product. So -- and at that time, 02:39:52

25 you know, even big, big companies, pension companies, 02:40:00



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1 they were buying this Cassava Science as well, you know. 02:40:03

2 So -- and from the search that I did on 02:40:11

3 Cassava Science, according to the Google, like I've done 02:40:13

4 with all my other stock, it seemed to be a good stock to 02:40:17

5 buy, a good share to buy. 02:40:21

6 Q Was your level of research into Cassava 02:40:24

7 similar to the other companies you invested in in 2021? 02:40:26

8 MR. DROSMAN: Objection. Vague and ambiguous. 02:40:30

9 THE WITNESS: I do not recall, sir. 02:40:32

10 BY MR. CAMPBELL: 02:40:35

11 Q Do you recall doing anything to research 02:40:36

12 Cassava differently than you did from research in the 02:40:37

13 other companies you invested in in 2021? 02:40:40

14 A That, still I do not recall, sir. 02:40:44

15 Q Anything significant about the news you read 02:40:54

16 about Cassava that you recall being a motivation to buy 02:40:55

17 300,000-plus worth of stock in February of 2021? 02:41:00

18 MR. DROSMAN: Objection. Vague and ambiguous. 02:41:04

19 THE WITNESS: Can you repeat your question, please. 02:41:06

20 BY MR. CAMPBELL: 02:41:08

21 Q Sure. 02:41:08

22 Anything stick out in your mind that you 02:41:08

23 recall from your Google search of Cassava that caused 02:41:10

24 you to want to buy more than \$300,000 worth of stock in 02:41:13

25 the company in February 2021? 02:41:17

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1           **A**     **I still don't understand your question.**           02:41:29

2                     **You're asking why I buy the stock? Is that**           02:41:30

3     **what you're saying?**           02:41:32

4           **Q**     **Yes.**           02:41:34

5           MR. DROSMAN: Objection. Asked and answered.           02:41:35

6           THE WITNESS: I do not recall, sir.           02:41:41

7     BY MR. CAMPBELL:           02:41:45

8           **Q**     **Anything -- any reason to believe Cassava was**           02:41:48

9     **better than any other Alzheimer's company?**           02:41:50

10          MR. DROSMAN: Objection. Vague and ambiguous.           02:41:53

11          THE WITNESS: That also, sir, I do not know.           02:41:58

12     BY MR. CAMPBELL:           02:42:02

13          **Q**     **Do you know the name of Cassava's product?**           02:42:02

14          **A**     **PT-125.**           02:42:05

15          **Q**     **Do you know what PT-125 is?**           02:42:12

16          **A**     **No, sir. I just know the name. I don't know**           02:42:15

17     **if I've passed the quiz or not, but I think it's PT-125.**           02:42:17

18          **Q**     **Do you have an understanding of what PT-125**           02:42:28

19     **stands for?**           02:42:30

20          MR. DROSMAN: Objection. Asked and answered.           02:42:31

21          THE WITNESS: No, sir.           02:42:32

22     BY MR. CAMPBELL:           02:42:32

23          **Q**     **Do you know anything about Cassava's history**           02:42:33

24     **as a company?**           02:42:34

25          MR. DROSMAN: Objection. Vague and ambiguous.           02:42:35

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